

SCOTT R. MONTGOMERY, ESQ., SBN 278060
smontgomery@abbeylaw.com
KAITLYN D. WRIGHT, ESQ., SBN 343722
kwright@abbeylaw.com
BANYAN PARKER, ESQ., SBN 303125
bparker@abbeylaw.com
ABBEY, WEITZENBERG, WARREN & EMERY, P.C.
100 Stony Point Road, Suite 200
Santa Rosa, CA 95401
Telephone: 707-542-5050 / Facsimile: 707-542-2589

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

A.G.,

Plaintiff,

v.

COUNTY OF SISKIYOU, JENNIFER
MOODY, CHILDREN FIRST FOSTER
AGENCY, DOES 1-100, INCLUSIVE,

Defendants.

Case No: 2:24-CV-01375 DJC CKD

**STIPULATION OF DISMISSAL OF
DEFENDANT HIS IDEAS, INC.
(erroneously sued herein as CHILDREN
FIRST FOSTER AGENCY) WITHOUT
PREJUDICE AND ENTRY OF
JUDGMENT; ORDER**

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR COUNSEL OF
RECORD:**

PLEASE TAKE NOTICE that plaintiff A.G. and Defendant His Ideas, Inc. (erroneously sued as Children First Foster Agency) hereby stipulate, through their undersigned counsel, that only Defendant His Ideas, Inc. (erroneously sued as Children First Foster Agency) be dismissed in its entirety without prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii).

The parties further stipulate that the Court shall direct the Clerk to enter judgment dismissing the Defendant His Ideas, Inc. (erroneously sued as Children First Foster Agency) without prejudice.

The parties further stipulate that each party shall bear its own costs and attorneys' fees.

///

1 Dated: March 14, 2025

ABBEY, WEITZENBERG, WARREN & EMERY

2
3 By: /s/ Kaitlyn D. Wright
4 Scott R. Montgomery, Esq.
5 Kaitlyn D. Wright, Esq.
Attorneys for Plaintiff

6 Dated: March 14, 2025

CLAPP, MORONEY, VUCINISH, BEEMAN & SCHELEY

7
8 By: /s/ Ashley N. Meyers
9 Christopher J. Beeman, Esq.
10 Ashley N. Meyers, Esq.
Attorneys for Defendant

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
ABBEY, WEITZENBERG, WARREN & EMERY, P.C.
100 Stony Point Road, Suite 200, Santa Rosa, CA 95401
Telephone: (707) 542-5050 Facsimile (707) 542-2589

ORDER

Pursuant to the parties' stipulation, the court orders that this action be dismissed in its entirety without prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii) as to Defendant His Ideas, Inc. (erroneously sued as Children First Foster Agency) only. The Clerk is directed to enter judgment dismissing Defendant His Ideas, Inc. (erroneously sued as Children First Foster Agency) without prejudice. Each party shall bear its own costs and attorneys' fees.

IT IS SO ORDERED.

Dated: March 14, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

ABBEY, WEITZENBERG, WARREN & EMERY, P.C.
100 Stony Point Road, Suite 200, Santa Rosa, CA 95401
Telephone: (707) 542-5050 Facsimile (707) 542-2589